UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1

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Proposed Counsel to Debtor and Debtor-In-Possession

In re:

FLAGSHIP RESORT DEVELOPMENT CORPORATION,1

Debtor.

Chapter: 11

Case No.: 25-15047 (JNP)

NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED TO BE HEARD ON MAY 14, 2025 AT 10:00 A.M. (EST)

PLEASE TAKE NOTICE that the matters listed below are currently scheduled to be heard on May 14, 2025 at 10:00 a.m. (EST) before the Honorable Judge Jerrold N. Poslusny, Jr.

PLEASE TAKE FURTHER NOTICE that this hearing will be held in-person. Parties, however, may observe virtually. Parties intending to observe virtually may do so via Zoom using the information on Schedule 1, annexed hereto.

MATTERS GOING FORWARD

1. Application for Designation as a Chapter 11 Complex Case [ECF No. 4].

Related Documents:

A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and

¹ The Debtor in this case, along with the last four digits of the Debtor's federal tax identification number is: Flagship Resort Development Corporation, a New Jersey corporation (1067). The location of the Debtor's service address is: 60 North Maine Avenue, Atlantic City, NJ 08401.

² Amendments to the agenda are noted in **bold**.

B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

2. Motion for an Order Authorizing the Debtor an Extension of Time Within Which to File Statements And Schedules [ECF No. 5].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

3. Motion re: Entry Of Interim And Final Orders (I) Authorizing The Debtor To (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, And Reimbursable Employee Expenses And (B) Continue Employee Benefits Programs And (II) Granting Related Relief [ECF No. 6].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

4. Motion re: Entry Of Interim And Final Orders (I) Authorizing Payment Of Certain Prepetition Taxes And Fees And (II) Granting Related Relief [ECF No. 7].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

5. Motion re: Entry Of Interim And Final Orders (I) Authorizing The Debtor To (A) Continue Its Prepetition Insurance Programs And (B) Pay All Prepetition Obligations Related Thereto, And (II) Granting Related Relief [ECF No. 8].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

6. Motion re: Entry Of Interim And Final Orders (A) Authorizing The Debtor To (I) Continue Use Of Its Cash Management System, (II) Maintain Its Existing Bank Accounts, And (III) Continue Use Of Its Existing Business Forms, (B) Granting Administrative Priority Status Postpetition Allocation Claims, And (C) Authorizing Continued Performance Under Allocation Arrangements And Historical Practices [ECF No. 9].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

7. Motion for an Order Authorizing the Debtor to Retain a Claims and Noticing Agent [ECF No. 15].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

8. Motion Re Entry Of Interim And Final Orders (I) Authorizing The Debtor To Obtain Postpetition Financing, (II) Authorizing Use Of Cash Collateral And Affording Adequate

Protection; (III) Granting Liens And Providing Superpriority Administrative Expense Status; (IV) Modifying Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief [ECF No. 10].

Related Documents:

- A. Declaration Of John Madden In Support Of Debtor's: (A) Motion For Interim And Final Orders (I) Authorizing The Debtor To Obtain Postpetition Financing, (II) Authorizing Use Of Cash Collateral And Affording Adequate Protection, (III) Granting Liens And Providing Superpriority Administrative Expense Status, (IV) Modifying Automatic Stay, (V) Scheduling A Final Hearing, And (VI) Granting Related Relief; And (B) Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtor To Obtain Post-Petition Financing Pursuant To The Existing Receivables Facilities, (II) Modifying Same And The Automatic Stay, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief [ECF No. 12];
- B. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- C. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

9. Motion re: Entry Of Interim And Final Orders (I) Authorizing The Debtor To Obtain Post-Petition Financing Pursuant To The Existing Receivables Facilities, (II) Modifying Same And The Automatic Stay, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief [ECF No. 11].

Related Documents:

A. Declaration Of John Madden In Support Of Debtor's: (A) Motion For Interim And Final Orders (I) Authorizing The Debtor To Obtain Postpetition Financing, (II) Authorizing Use Of Cash Collateral And Affording Adequate Protection, (III) Granting Liens And Providing Superpriority Administrative Expense Status, (IV) Modifying Automatic Stay, (V) Scheduling A Final Hearing, And (VI) Granting Related Relief; And (B) Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtor To Obtain Post-Petition Financing Pursuant To The Existing Receivables Facilities, (II) Modifying Same And The Automatic Stay, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief [ECF No. 12];

- B. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- C. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: This matter is going forward with permission of the Court.

10. Motion re: Entry Of Orders (I) (A) Approving Bidding Procedures For The Sale Of Substantially All Of The Debtors Assets, (B) Approving Stalking Horse Purchase Agreement, (C) Scheduling An Auction And A Sale Hearing, (D) Approving The Form And Manner Of Notice Thereof, (E) Establishing Notice And Procedures For The Assumption And Assignment Of Contracts And Leases; And (F) Granting Related Relief And (II) (A) Authorizing The Debtor To Enter Into An Asset Purchase Agreement, (B) Approving The Asset Purchase Agreement, And (C) Authorizing The Assumption And Assignment Of The Assumed Contracts [ECF No. 13].

Related Documents:

- A. Declaration of Cherie Parks, Chief Financial Officer of the Debtor, in Support of Debtor's Chapter 11 Petition and First Day Motions [ECF No. 16]; and
- B. Order Regarding Application for Expedited Consideration of First Day Matters [ECF No. 18].

Status: Informal comments received from the U.S. Trustee. The Debtor anticipates this matter moving forward as a status hearing only.

Dated: May 13, 2025 PORZIO, BROMBERG & NEWMAN, P.C.

By: /s/ Warren. J. Martin Jr.
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Proposed Counsel to the Debtor and Debtorin-Possession, Flagship Resort Development Corporation

SCHEDULE 1

Topic: Case No.: 25-15047 /Flagship Resort Development Corporation

Hearing Date and Time: May 14, 2025 at 10:00 a.m. (EST)

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